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M. Andree Green  
County Administration Building  
14741 Governor Oden Bowie Drive, Room 5121  
Upper Marlboro, MD 20772-3050

March 29, 2012

Dear Ms. Green:

I represent Miguel Morales who is the plaintiff in the case *Morales v. Unknown Prince George's County Employees*, No. 1:12-cv-919 (D.Md. 2012). As described in the Complaint in that case, which I am enclosing, Mr. Morales was unconstitutionally detained for approximately two weeks beyond the date that he was ordered released by a judicial officer.

The reason I am writing is to attempt to secure your voluntary assistance in identifying the individual or individuals: 1) who made the decision to detain Mr. Morales after the judicial officer ordered him released; 2) who, on April 17, 2010, told Mr. Morales's brother that although there was no immigration hold for Mr. Morales, he could not be released; and 3) who, on April 19, 2010 told Mr. Morales that he would be released soon.

I am requesting that you provide me with a copy of: any records naming the employees who were working on April 17 or 19, 2010 at the Prince George's County Correctional Center and who would potentially have spoken to Mr. Morales or his brother, as well as photographs of such employees so that Mr. Morales and his brother can pick out the employees that spoke to them; an organizational chart and job descriptions of individuals whose responsibilities, as of April 2010, included determining when to release detainees; a list of employees that did, or likely would have, received a copy of the judicial order for Mr. Morales' release; any disciplinary or investigative records into potential misconduct by the individual or individuals who failed to release Mr. Morales in a timely manner; and any other records or information that would identify who was responsible for the failure to release Mr. Morales.

I appreciate your cooperation in this matter so that I may avoid the need to resort to issuing a subpoena and deposing the County in order to obtain the identities of the individuals who should be named as defendants.

Sincerely,

Rachael A.S. Moshman